

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

IN RE:  
Roca Labs Inc  
Debtor(s)

CASE NO.: 8:17-bk-09732-CPM  
CHAPTER 7

**MOTION TO COMPEL TURNOVER OF NON EXEMPT ASSETS**

COMES NOW the Trustee, NICOLE M. CAMERON, by and through her undersigned attorney, and hereby moves this Honorable Court for an order compelling PayPal, Inc. to turn over the funds held in PayPal, Inc. account #1204895147681012587 and, in support, would show the Court the following:

**NOTICE OF OPPORTUNITY TO  
OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within thirty (30) days from the date set forth on the attached proof of service plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at Sam M. Gibbons U.S. Courthouse, 801 North Florida Avenue, Suite 555, Tampa, Florida 33602-3899, and serve a copy on the movant's attorney, Nicole M. Cameron, Esquire, 235 Apollo Beach Blvd., #231, Apollo Beach, Florida 33572 and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

1. That Nicole M. Cameron is the duly-appointed and acting Chapter 7 Trustee in the above-styled case.
2. Trustee received documents from PayPal, Inc. of an open account (account #1204895147681012587) held under Debtor's tax identification number ending in 5366.
3. The account is listed as a business account and indicates there is \$11,581.00 being held in the account.
4. The PayPal, Inc. account is an asset of Debtor's Bankruptcy Estate.

5. These funds were originally found by the investigation of the SEC into Debtor's principal's affairs.
6. The SEC advised Trustee of the account and advised the SEC would not be making a claim on the funds as the funds were an asset of Debtor and not Debtor's principal.
7. Therefore, Trustee requests an order compelling PayPal, Inc. to close the account and forward the funds payable to Nicole M. Cameron, Trustee.

WHEREFORE, the Trustee moves this Honorable Court for an order compelling the PayPal, Inc. to turnover to the Trustee the funds held in PayPal account #1204895147681012587.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Trustee's Motion to Compel Turnover of Non Exempt Assets has been sent by the Court's CM/ECF system on October 7, 2019 to **Asst. U.S. Trustee**, 501 E. Polk St., #1200, Tampa, FL 33602 and **Glenn A Reid, Esq.**, THE LAW OFFICE OF GLENN A REID, P.A., 3415 WEST LAKE MARY BOULEVARD, SUITE 950554, LAKE MARY, FL 32798 and Via US Mail on October 8, 2019 to: **Roca Labs Inc**, PO BOX 950554, LAKE MARY, FL 32795, and **PayPal, Inc., Attn. Dan Schulman, President**, 2211 N. 1st St., San Jose, CA 95131 and **PayPal, Inc.**, Attn.: Cassandra Richards, Legal Specialist, 7700 E. Port Pkwy, La Vista, NE 68128 and **Paypal, Inc.**, c/o CT Corporation System, 1200 S. Pine Island Rd., Plantation, FL 33324.

/s/ Nicole M. Cameron  
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